

## **NOTIFICATION OF COURT ORDER**

On July 30, 2019, an Order was issued in *People of the State of California v. James Heaps*, Los Angeles County Superior Court, Case No. LAXSA100560-01 by Yvette Verastegui, Judge Presiding. Under the Order, as a condition of bail, JAMES MASON HEAPS, M.D. (Physician's and Surgeon's Certificate Number G53039) is restricted effective July 30, 2019. A copy of the Order is attached.

1 XAVIER BECERRA  
Attorney General of California  
2 JUDITH T. ALVARADO  
Supervising Deputy Attorney General  
3 BRIAN ROBERTS  
Deputy Attorney General  
4 State Bar No. 282868  
California Department of Justice  
5 300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
6 Telephone: (213) 269-6614  
Facsimile: (213) 897-2810  
7 *Attorneys for Kimberly Kirchmeyer, Executive  
Director, Medical Board of California*

**FILED**  
Superior Court of California  
County of Los Angeles  
JUL 30 2019  
Sherri R. Carter Executive Officer Clerk of Court  
By *[Signature]* James Dittmer Deputy

8  
9  
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

11 **PEOPLE OF THE STATE OF**  
12 **CALIFORNIA,**

13 Plaintiff,

14 v.

15 **JAMES HEAPS,**

16 Defendant.  
17

18  
19 **KIMBERLY KIRCHMEYER,**  
**EXECUTIVE DIRECTOR, MEDICAL**  
20 **BOARD OF CALIFORNIA,**

21 **DEPARTMENT OF CONSUMER**  
**AFFAIRS**  
22 **STATE OF CALIFORNIA,**

23 Applicant.  
24

Case No. LAXSA100560-01

**STIPULATION AND ORDER**

[Pen. Code, § 23]

25 **STIPULATION**

26 IT IS HEREBY STIPULATED AND AGREED to by and between the parties to the above-  
27 entitled proceedings as follows:  
28

1       1.   Kimberly Kirchmeyer (Applicant) is the Executive Director of the Medical Board of  
2 California, Department of Consumer Affairs (Board). She is represented in this matter by Xavier  
3 Becerra, Attorney General of California, Judith Alvarado, Supervising Deputy Attorney General,  
4 and Brian Roberts, Deputy Attorney General.

5       2. James Heaps, M.D., (Defendant or Dr. Heaps) is represented in this matter by attorneys  
6 Tracy Green and Leonard Levine. Dr. Heaps is currently retired and not practicing medicine.

7       3.   On or about July 16, 1984, the Medical Board of California issued Physician's and  
8 Surgeon's Certificate No. G 53039 to Defendant. The Physician's and Surgeon's Certificate was  
9 in full force and effect at all times relevant to the criminal charges brought in the Felony  
10 Complaint filed in the matter of the *People of the State of California v. James Heaps, M.D.*, Case  
11 No. LAXSA100560-01. Dr. Heaps denies any and all allegations in this matter.

12       4.   The Board is the state agency charged with protecting the public through the licensing  
13 and discipline of physicians and surgeons in the State of California.

14       5.   Section 23 of the Penal Code provides in pertinent part:

15           In any criminal proceeding against a person who has been issued a license to  
16 engage in a business or profession by a state agency pursuant to provisions of the  
17 Business and Professions code ... the state agency which issued the license may  
18 voluntarily appear to furnish pertinent information, make recommendations  
19 regarding specific conditions of probation, or provide any other assistance necessary  
20 to promote the interests of justice and protect the interests of the public, or may be  
21 ordered by the court to do so, if the crime charged is substantially related to the  
22 qualifications, functions, or duties of a licensee.

23       6.   The Board, through Deputy Attorney General Brian Roberts, provided notice to  
24 Defendant of appearance and application to this Court, under Penal code section 23, for an order  
25 prohibiting Defendant from engaging the practice of medicine during the pendency of the  
26 criminal action. Given that Dr. Heaps is not currently practicing medicine, Dr. Heaps will  
27 stipulate to this cease and desist order with the understanding and agreement that this Stipulation  
28

## STIPULATION AND ORDER

1 Dated: July 30, 2019

XAVIER BECERRA  
Attorney General of California  
JUDITH T. ALVARADO  
Supervising Deputy Attorney General

2  
3  
4  
5 BRIAN ROBERTS  
Deputy Attorney General  
Attorneys for Applicant, Kimberly  
Kirchmeyer, Executive Director,  
Medical Board of California  
6  
7  
8  
9

10  
11 **ORDER**

12 GOOD CAUSE APPEARING, the Stipulation is adopted as the Court's Order, and  
13 Defendant James Heaps, M.D., shall comply with the terms as set forth in Paragraph 7 above and  
14 be subject to the Stipulations set forth in Paragraph 6.  
15

16  
17 Dated: 7.30.19, 2019

18  
19   
20 JUDGE OF THE SUPERIOR COURT

21 YVETTE VERASTEGUI





THE DOCUMENT TO WHICH THIS CERTIFICATE IS AT-  
TACHED IS A FULL, TRUE AND CORRECT COPY OF THE  
ORIGINAL ON FILE AND OF RECORD IN MY OFFICE

ATTEST: 8/14/17  
Sheri R. Carter, Executive Officer/Clerk  
of the Superior Court of California, County of  
Los Angeles.

BY: [Signature] DEPUTY